

EXHIBIT A

**TO THE DECLARATION OF STEVE W. BERMAN
IN OPPOSITION TO MOTION TO COMPEL "PROPER ANSWERS"
TO BMS' CONTENTION INTERROGATORIES**

EXHIBIT A

DEFENDANTS' THIRD-PARTY SUBPOENAS TO CLASS MEMBERS

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
AARP Health Care Options 601 E Street, N.W. Washington, D.C. 20049 Jason H. Ehrenberg, Esq. Michael Prame The Groom Law Group 1701 Pennsylvania Ave. NW Washington, D.C. 20006	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
<p>Advantra 6705 Rockledge Drive, Suite 900 Bethesda, MD 20817</p> <p>Thomas Zielinski, Esq. Sr. VP & Gen. Counsel Advantra</p>	Health Insurer/HMO	<p>Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all</p>	11/17/03	12/8/03	yes	<p>Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor</p>	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Aetna U.S. Health Care 151 Farmington Ave. MB 51 Hartford, CT 06156 Peter St. Phillips, Esq. Lowey Dannenberg Bemporad & Selinger, P.C.	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies,	11/14/03	12/4/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
1 North Lexington Ave., 11 Floor White Plains, NY 10601-1714		procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts depts.					

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
Allscripts, Inc. 2401 Commerce Ave. Libertyville, IL 60048-4464			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
AmeriChoice Health Services, Inc. 8045 Leesburg Pike, 6 th Floor Vienna, VA 22182 Thomas F. Fitzgerald Michael J. Prame Lars C. Golumbic, Esq. The Groom Law Group 1701 Pennsylvania Ave., NW Washington, D.C. 20006	Health Insurer/HMO (specializes in public sector programs, including Medicaid, Medicare and CHIPs)	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin.,	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	yes

Target/Company	Business of Target	Documents Sought	Date Served	Remit Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Anthem Prescription Management, LLC 8990 Duke Blvd. Mason, OH 45040			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Beacon Health Plans Ponce de Leon Blvd. 5 th Floor Coral Gables, FL 33134			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	

Target Company	Business of Target	Documents Sought	Date Served	Return Due	Served w/ Updated Subpoena	Defense Counsel/ Updated	Served
Blue Cross & Blue Shield of Florida, Inc. P.O. Box 1798 Jacksonville, FL 33231-0014			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Blue Cross & Blue Shield of Kansas 2301 Main Street Kansas City, MO 64108			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Blue Cross & Blue Shield of Montana 560 N. Park Avenue Helena, MT 59601			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Blue Cross & Blue Shield of Nebraska 7261 Mercy Rd. Omaha, NE 68180			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Blue Cross & Blue Shield of Tennessee			4/28/04			Erik Haas Patterson Belknap	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served Observations
801 Pine Street Chattanooga, TN 37402-2555						Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Care America Health Plans 6300 Canoga Ave. Woodland Hills, CA 91367					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Greg Pimstone, Esq. Manatt, Phelps & Phillips 11355 W. Olympic Blvd Los Angeles, CA 90064	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement;	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	
CIGNA Healthcare 1601 Chestnut Street One Liberty Place Philadelphia, PA 19192							
Peter St. Phillips, Esq. Lowey Dannenberg Bemporad & Selinger, P.C. 1 North Lexington Ave. 11 Floor							

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Undated Subpoena	Defense Counsel/ Defendant(s)	Served
White Plains, NY 10601-1714		decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.	4/28/04			Erik Haas Patterson Belknap Webb & Tyler	
Cobalt Corporation 401 W. Michigan Street Milwaukee, WI 53203-							

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2896						1133 Avenue of the Americas New York, NY 10036	
Connecticut General Life Ins. Co. Eric W. Sitarchuk Sally M. Williams Ballard Spahr Andrews & Ingersoll, LLP 1735 Market Street 51 st Floor Philadelphia, PA 19103-7599 P: (215) 864-8220							yes
Coventry Health Care, Inc. 6705 Rockledge Drive Bethesda, MD 20817 Thomas Zielinski, Esq. Sr. VP & Gen. Counsel Coventry Healthcare, Inc. 2751 Centerville Rd. Suite 400 Wilmington, DE 19808					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	yes
CPIC Life 50 Beale Street	Health Insurer/HMO (subsidiary of Blue	Docs relating to AWP; setting of	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served/Objections
<p>San Francisco, CA 94105-1808</p> <p>Greg Pimstone, Esq. Manatt, Phelps & Phillips 11355 W. Olympic Blvd Los Angeles, CA 90064</p>	Shield of California)	<p>reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov.</p>				Coie; Astra, BSM, GSK, Immunex, Centocor	

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		entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.	4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Eckerd Health Services 620 Epsilon Drive Pittsburgh, PA 15238					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Empire Blue Cross & Blue Shield 15 Metrotech Center Brooklyn, NY 11201 Louis Benza, Esq. Empire Blue Cross First Health 3200 Highland Avenue Downers Grove, IL 60516			4/27/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
First Health Services Corporation			4/23/04			Erik Haas Patterson Belknap	

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4300 Cox Road Glen Allen, VA 23060						Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Gateway Health Plan U.S. Steel Tower 41 600 Grant Street Pittsburgh, PA 15219 Jerry R. Hogenmiller Thomson, Rhodes & Cowie, P.C. Two Chatham Ctr., 10 th Floor Pittsburgh, PA 15219-3499 P: (412) 316-8689 F: (412) 232-3498 JH@TRC-LAW.com	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs;	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	

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		docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
GE Financial Company 100 Brightmeadow Road Enfield, CT 06083 Kathy Furst, Esq. GE Financial Company					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Harvard Pilgrim Healthcare 93 Worcester Street Wellesley, MA 02841 Harvey Cotton, Esq.					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Health America/ Health Assurance					4/7/04	Erik Haas Patterson Belknap	yes

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3121 TecPort Drive P.O. Box 67103 Harrisburg, PA 17106						Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Thomas Zielinski, Esq. Sr. VP & Gen. Counsel Health America/ Health Assurance 2751 Centerville Rd. Suite 400 Wilmington, DE 19808						Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Health Net, Inc. 21281 Burbank Blvd. Woodland Hills, CA 91367					4/7/04 4/30/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Robert Slaughter, Esq. Lewis Brisbois, Bisgaard & Smith 221 N. Figueroa St., Suite 1200 Los Angeles, CA 90012						Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Healthcare Service Corporation 300 E. Randolph Street Chicago, IL 60601			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	

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<p>Highmark Life and Casualty Group 120 Fifth Avenue Pittsburgh, PA 15222</p> <p>Peter St. Phillips, Esq. Lowey Dannenberg Bemporad & Selinger, P.C. 1 North Lexington Ave. 11 Floor White Plains, NY 10601-1714</p>		<p>Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual</p>	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

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		relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
HIP of New York 7 W. 34 th Street New York, NY 10001-8190 Bruce H. Schneider Stroock, Stroock & Lavan, LLP 180 Maiden Lane New York, NY 10038-4982	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served/ Objections
		docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Horizon Healthcare 1180 Avenue of the Americas New York, NY 10036 Lenore Brady, Esq. Horizon Healthcare	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies,	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defensor Counsel/ Defendant(s)	Served Objections
		<p>procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.</p>					

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Humana, Inc. 500 W. Main St. Louisville, KY 40201-1438 Bradley Wood, Esq. Humana Inc. Richard W. Cohen Peter D. St. Phillips, Jr. Lowey Dannenberg Bemporad & Selinger, P.C. The Gateway – 11 th Fl. One Lexington Avenue White Plains, NY 10601 P: (914) 997-0500					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	Yes
Independent Health 511 Farber Lakes Drive Buffalo, NY 14221 Melinda Rieske, Esq. Independent Health		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

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		<p>reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation,</p>					

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Integrated Medical Systems, Inc. 1823 27 th Avenue South Birmingham, AL 35209 Kelly Upchurch, Esq.	.	investigation, inquiry; org charts. Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs;	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

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		docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Intracorp 1601 Chestnut Street Two Liberty Place Philadelphia, PA 19192 Barbara Billman Intracorp Eric W. Sitarchuk Sally M. Williams Ballard Spahr Andrews & Ingersoll, LLP 1735 Market Street 51 st Floor Philadelphia, PA		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served/Updated Subpoena	Defense Counsel/Defendant(s)	Served Objections
19103-7599 P: (215) 864-8220		pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
John Deere Health Care, Inc. Deere & Company 1300 River Drive	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and	11/14/03	12/4/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK,	

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East Moline, IL 61244 Laura Knoll, Esq.		reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal				Immunex, Centocor	

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		agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts depts.					
Kaiser Foundation Hospitals: The Prentice-Hall Corp. System One Kaiser Plaza 25 th Floor Oakland, CA 94612					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Robert Rhoad, Esq. Porter, Wright, Morris & Arthur 1919 Pennsylvania Ave. N.W. Suite 500 Washington, D.C. 20006-3434							
Kaiser Permanente One Kaiser Plaza 25 th Floor Oakland, CA 94612	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies,	11/14/03	12/4/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	
Robert Rhoad, Esq. Porter, Wright, Morris & Arthur 1919 Pennsylvania							

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Ave., NW, Suite 500 Washington, DC 20006-3434		procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts					

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Liberty National Ins. Co. 2001 Third Ave. S. Birmingham, AL 35233			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Louisiana Health Service & Indemnity Co., Inc. 5525 Reitz Avenue Baton Rouge, LA 70898-9029			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
MedImpact Healthcare Systems, Inc. 10680 Treena Street, 5 th Floor San Diego, CA 92131			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
MedPlus 300 Oxford Drive Monroeville, PA 15146-2343 Curtis Krasik, Esq. Kirkpatrick & Lockhart, LLP Henry W. Oliver Bldg.	Claims Processor and other software solutions	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies,	11/14/03	12/4/03	yes	Erik Haas, Patterson, Balknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	

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535 Smithfield Street Pittsburgh, PA 15222-2312		procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts					

Party (Company)	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
Metropolitan Life Ins. Co. 1 Madison Avenue New York, NY 10010			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Multiplan, Inc. 115 5 th Avenue New York, NY 10003 Marcy Feller, Esq. Multiplan, Inc.		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served/Updated Subpoena	Defense Counsel/Defendant(s)	Served Objections
		Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
New York Life Insurance Company 51 Madison Avenue New York, NY 10010 Donna Alstram, Esq.	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Oxford Health Plans 48 Monroe Turnpike	Health Insurer/HMO	Docs relating to AWP; setting of	11/14/03	12/5/03	yes	Erik Haas, Patterson, Belknap,	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served/ Objections
Trumbull, CT 0661 Peter St. Phillips, Esq. Lowey Dannenberg Bemporad & Selinger, P.C. 1 North Lexington Ave. 11 Floor White Plains, NY 10601-1714		reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov.				Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
PacificCare Health Systems 5995 Plaza Dr. Cypress, CA 90630 Christopher Pace, Esq. Cooley Godward 4401 Eastgate Mall San Diego, CA 92121-1909	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin.,	11/14/03	12/5/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defuse Counsel/ Defendant(s)	Served Objections
		consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
PharmaCare Direct, Inc. 6820 Fairfield Business Center Fairfield, OH 45014			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Preferred One 6105 Golden Hills Drive Golden Valley, MN 55416 Melinda Maher, Esq.		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
Preferred One		<p>reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal</p>					

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served/Objections
		agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Prescription Solutions, Inc. 3515 Harbor Blvd. Costa Mesa, CA 92626			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
ScripSolutions 100 Clearbrook Rd. Elmsford, NY 10523			4/23/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Select Med Intermountain Health Care Health Plans 36 So. State St. Floor 22 Salt Lake City, UT 84111 Kevin Lawlor, Esq. Select Med	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications	11/14/03	12/5/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
The Agon Company 520 Park Avenue		Docs relating to AWP; setting of	11/19/03	12/12/03	yes	Paul Schmidt, Covington &	

Party/Company	Fairness of Target	Documents Sought	Date Served	Return Date	Served/Updated Subpoena	Defense Counsel/Defendant(s)	Served Objections
Baltimore, MD 21201		reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis;				Burling; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
The Regence Group 200 Southwest Market St. Portland, OR 97201 Lisa Heinichen, Esq. Regence Group	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best	11/14/03	12/5/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
Trigon Ins. Co. 2015 Staples Mill Rd. Richmond, VA 23230			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Unicare Life & Health Insurance Co. 233 S. Wacker Dr., Suite 3900	Health Insurer/HMO	Docs relating to AWP; setting of reimbursement/payment rates; costs and	11/14/03	12/5/03	yes	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK,	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served/ Objections
Chicago, IL 60606 Deanne Miller, Esq. Morgan, Lewis & Bockius, LLP 300 S. Grand Ave 22 nd Floor Los Angeles, CA 90071-3132		reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal				Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					
United American Ins. Co. 3700 S. Stonebridge Dr. McKinney, TX 75070-5934			4/28/04			Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
United HealthCare 9900 Bren Road East Minnetonka, MN 55343 Thomas F. Fitzgerald Michael Prame The Groom Law Group 1701 Pennsylvania Ave. NW Washington, D.C. 20006		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re:	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	yes

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry, org charts.					
UPMC Health Plan One Chatham Center 112 Washington Place Pittsburgh, PA 15219		Docs relating to AWP; setting of reimbursement/payment rates; docs relied upon for reimbursement/payment	11/19/03	12/12/03	yes	Paul Schmidt, Covington & Burling; Astra, BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
Dan Vuckmer, Esq. UPMC Health Plan		rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from					

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served Objections
		CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.	4/23/04				
Walgreens Health Initiatives 200 Wilnot Road, #2661 Deerfield, IL 60015-4616						Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Wellmark Blue Cross Blue Shield 636 Grand Avenue Des Moines, IA 50309 Hayward L. Draper, Esq. Nyemaster, Goode, Voights, West, Handell & O'Brien 700 Walnut Street, Suite 1600 Des Moines, IA 50309-3899					4/7/04	Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	
Wellpoint Pharmaceutical Management		Docs relating to AWP; setting of reimbursement/payment	11/19/03	12/12/03	4/23/04	Paul Schmidt, Covington & Burling; Astra,	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served Objections
1 WellPoint Way Thousand Oaks, CA 91362		rates; docs relied upon for reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external				BSM, GSK, Immunex, Centocor	

Target Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/Defendant(s)	Served/Objections
Zurich North America 1400 American Lane Schaumburg, IL 60196 Gil Soffer, Esq. Katten, Muchin, Zavis & Roseman 525 West Monroe St. Suite 1600 Chicago, IL 60661-3693	Health Insurer/HMO	investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts. Docs relating to AWP; setting of reimbursement/payment rates; costs and reimbursement to providers; awareness of diff. between costs and reimbursement; processing policies, procedures; payments made; communications relating reimbursement; decision to rely on drug pricing; docs from any publisher; docs re: AWP's; docs re: difference between AWP and payment; all docs re: AWP, AMP, WAC, MAC, EAC, Best Price; contractual	11/17/03	12/8/03	yes	Kathleen O'Sullivan, Perkins Coie; Astra, BSM, GSK, Immunex, Centocor	

Purser/Company	Business of Target	Documents Sought	Date Served	Return Date	Served w/ Updated Subpoena	Defense Counsel/ Defendant(s)	Served Objections
		relationships with PBM, 3 rd party admin., consultants, auditors, etc., re: subject drugs; docs. identify persons involved in contractual relationship with PBM, docs re: profit analysis; docs re: internal/external investigations; all filings with state/federal gov. entity; all docs. from CMS, HHS, federal agency re: pricing of drugs; all docs produced by you in litigation, investigation, inquiry; org charts.					